

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

LOCKET IP LLC,

Plaintiff,

v.

FORTILINE, LLC,

Defendant.

Case No. 4:22-cv-00920-ALM

Jury Trial

PROPOSED DEADLINES FOR SCHEDULING ORDER

March 3, 2023	P.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions (and P.R. 3-2 document production) to be served.
March 28, 2023	Join Additional Parties
March 28, 2023	P.R. 3-3 Invalidity Contentions (and P.R. 3-4 document production) to be served. To extent not already required to be disclosed, exchange Mandatory Disclosures on all issues, including damages.
To be discussed at Mgmt. Conf.	Mediation. The Court will discuss appointing a mediator at the Scheduling Conference.
April 7, 2023	Parties to exchange proposed terms for construction and identify any claim element governed by 35 U.S.C. § 112, ¶ 6 (P.R. 4-1).
April 11, 2023	Privilege Logs to be exchanged by parties (or a letter to the Court stating that there are no disputes as to claims of privileged documents).
April 27, 2023	Parties to exchange preliminary proposed claim construction and extrinsic evidence supporting same (P.R. 4-2).
May 23, 2023	Parties' Final Amended Pleadings (A motion for leave is required.)
May 26, 2023	Joint Claim Construction and Prehearing Statement to be filed (P.R. 4-3). Provide an estimate of how many pages are needed to brief the disputed claims.

June 2, 2023	Submit technology synopsis/tutorial (both hard copy and disk).
June 13, 2023	Respond to Amended Pleadings
June 26, 2023	Completion date for discovery on claim construction (P.R. 4-4).
July 11, 2023	Opening claim construction brief (P.R. 4-5(a)).
July 25, 2023	Responsive claim construction brief (P.R. 4-5(b)).
August 1, 2023	Reply claim construction brief (P.R. 4-5(c)).
August 7, 2023	Parties to file joint claim construction and chart (P.R. 4-5(d)). Parties shall work together to agree on as many claim terms as possible.
August 17, 2023	Proposed Claim Construction hearing Thursday, August 17, 2023, at 9:00 a.m. at the Paul Brown United States Courthouse, 101 E. Pecan Street, Sherman, Texas 75090.
September 21, 2023	Deadline for Initial Mandatory Disclosure of all persons, documents, data compilations and tangible things, which are relevant to a claim or defense of any party and which has not previously been disclosed. This deadline is not an extension of earlier deadlines set out in this court's order or the Patent Rules, nor an excuse to delay disclosure of information. It is a "catchall" deadline for provision of all remaining information which may be relevant to a claim or defense of any party at trial.
October 19, 2023	Parties with burden of proof to designate Expert Witnesses other than claims construction experts and provide their expert witness reports, to include for ALL experts all information set out in Rule 26(a)(2)(B).
October 30, 2023	Comply with P.R. 3-7. (Designation of Willfulness Opinions).
November 2, 2023	Parties to Designate Expert Witnesses on issues for which the parties do not bear the burden of proof, and provide their expert witness report, to include for ALL experts all information set out in Rule 26(2)(B). Note: Objections to any expert, including Daubert motions, shall be filed within 3 weeks after the expert's Report has been disclosed. Such objections and motions are limited to ten pages each.

November 16, 2023	<p>File Dispositive Motions and any other motions that may require a hearing. Regardless of how many dispositive motions a party files, each party is limited to a total of sixty pages for such motions. Each individual motion shall comply with Local Rule CV-7.</p> <p>Responses to motions shall be due in accordance with Local Rule CV-7(e).</p>
November 16, 2023	Discovery Deadline. All discovery must be served in time to be completed by this date.
March 1, 2024	Notice of intent to offer certified records
March 1, 2024	Counsel and unrepresented parties are each responsible for contacting opposing counsel and unrepresented parties to determine how they will prepare the Joint Final Pretrial Order (<i>See www.txed.uscourts.gov</i>) and Proposed Jury Instructions and Verdict Form (or Proposed Findings of Fact and Conclusions of Law in nonjury cases).
March 6, 2024	<p>Motions in limine due</p> <p>File Joint Final Pretrial Order. Exchange Exhibits and deliver copies to the court. At this date, all that is required to be submitted to the court is a hyperlinked exhibit list on disk (2 copies) and no hard copies.</p>
March 8, 2024	<p>Deposition Designations due. Each party who proposes to offer a deposition shall serve on all other parties a disclosure identifying the line and page numbers to be offered. All other parties will have seven calendar days to serve a response with any objections and request cross-examination line and page numbers to be included. Counsel must consult on any objections, and only those which cannot be resolved shall be presented to the Court.</p> <p>The party who filed an initial Video Deposition Designation is responsible for preparation of the final edited video in accordance with all parties' designations, the applicable Federal Rules of Civil Procedure, and the Court's rulings on objections.</p>
March 22, 2024	<p>Response to motions in limine due</p> <p>File objections to witnesses, deposition extracts, and exhibits, listed in pre-trial order. (This does not extend the deadline to object to expert witnesses). If numerous objections are filed the court may set a hearing prior to the final pretrial conference. File Proposed Jury Instructions/Form of Verdict (or Proposed Findings of Fact and Conclusions of Law).</p> <p>If Parties will be requesting daily copy of the transcript during trial, they must notify the Court's court reporter, Chris Bickham, Chris.Bickham@txed.uscourts.gov, by this date.</p>

April 5, 2024	Final Pretrial Conference at 9:00 a.m. at the Paul Brown United States Courthouse, 101 E. Pecan Street, Sherman, Texas 75090.
TBD	10:00 a.m. Jury Selection and Trial at the Paul Brown United States Courthouse located at 101 East Pecan Street in Sherman, Texas.